

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PROJECT ON PREDATORY STUDENT	)	
LENDING OF THE LEGAL SERVICES	)	
CENTER OF HARVARD LAW SCHOOL,	)	
	)	Civil Action No. 17-210-NBF
Plaintiff,	)	
	)	The Honorable Nora Barry Fischer
v.	)	
	)	
	)	( <i>Electronic Filing</i> )
UNITED STATES DEPARTMENT OF	)	
JUSTICE,	)	
Defendant.	)	

**SIXTH POST-JUDGMENT STATUS REPORT**

The parties respectfully submit the instant Sixth Post-Judgment Status Report, consistent with the Court’s Order dated December 14, 2018. Order, ECF No. 95.

On October 11, 2018, the parties filed their Third Post-Judgment Status Report, noting that, on October 4, 2018, Defendant, the Department of Justice (“DOJ”), had produced the remaining pages of the AI Dallas CD to Plaintiff, the Project on Predatory Student Lending (“Plaintiff”), consistent with the Court’s September 27, 2018 Order. Third Post-Judgment Status Report, ECF No. 87 (Oct. 11, 2018). The status report noted that the parties were in communication regarding the bases of certain redactions in the produced pages. *Id.* at 2.

On November 13, 2018, the parties filed a Fourth Post-Judgment Status Report, ECF No. 92, notifying the Court that new defense counsel had been substituted, and that the parties remained in communication regarding the redactions to the AI Dallas records. On December 13, 2018, the parties filed their Fifth Post-Judgment Status Report, notifying the Court that defense counsel would conduct a review of the AI Dallas records that were originally produced to Plaintiff on October 4, 2018, and would re-produce the AI Dallas records to Plaintiff on a rolling basis, with

the first set of documents to be produced on or before December 19, 2018. ECF No. 94. The parties also requested an additional 60 days to file another Status Report. *Id.* On December 14, 2018, the Court ordered the parties to file another Joint Status Report by February 14, 2019. This report fulfills that obligation.

Since filing their last Joint Status Report, defense counsel has reviewed a portion of the AI Dallas documents, identifying some that could be reproduced to Plaintiffs with fewer redactions. On December 19, 2018, Defendant made its first reproduction of documents to Plaintiffs. Plaintiff's counsel reviewed those documents and agree that the redactions Defendant made to those re-produced documents are appropriate. Defense counsel's review remains ongoing, and Defendant intends to make a second reproduction of documents this week.

Because the undersigned counsel for the Department of Justice were on furlough status for this matter and unable to work on it during the 35-day lapse in appropriations between December 22, 2018 and January 25, 2019, defense counsel needs additional time to complete the review and re-production of the remaining AI Dallas records. To give defense counsel sufficient time to complete the production, the parties request an additional 60 days, until April 15, 2019, to file another Status Report advising the Court as to the status of the production and any remaining issues related to these records.

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Respectfully submitted,

/s/ Toby Merrill

Toby Merrill  
Eileen Connor  
Legal Services Center of Harvard  
Law School  
122 Boylston Street  
Jamaica Plain, MA 02140  
Tel: (617) 390-2710  
Fax: (617) 522-0715  
[tomerrill@law.harvard.edu](mailto:tomerrill@law.harvard.edu)  
[ec Connor@law.harvard.edu](mailto:ec Connor@law.harvard.edu)

JOSEPH H. HUNT  
Assistant Attorney General  
Civil Division

SCOTT W. BRADY  
United States Attorney  
Western District of Pennsylvania

ELIZABETH J. SHAPIRO  
Deputy Director  
Civil Division, Federal Programs Branch

/s/ Lisa Zeidner Marcus

LISA ZEIDNER MARCUS  
Senior Counsel  
U.S. Department of Justice, Civil Division  
Federal Programs Branch

/s/ Karen Gal-Or

KAREN GAL-OR  
Assistant U.S. Attorney

Dated: February 14, 2019